UNITED STATES DISTRICT COURT EASTERN DISTRICT OF MICHIGAN

Robert Edward lee 430 E. Warren Ave Apt#107 Detroit, MI 48201 Plaintiff(s),

Case:2:14-cv-11722

Judge: Leitman, Matthew F.

MJ: Whalen, R. Steven

Filed: 04-30-2014 At 12:53 PM CMP LEE V. SAI LI M.D. (DA)

Sái Li. MD CENTER FOR FORENSIC Psychiatry P.O. BOX 2060 ANN ARBOR, MT 48106 Defendant(s).

COMPLAINT

I. <u>Defendant(s)</u>. Print the full name for each defendant. If there are more defendants, use additional pages to provide their names.

1.	Sai Li, M.D. Staff Psychialrist Unit South-
<u>2.</u>	
<u>3.</u>	
4.	
_5.	

II. <u>Statement of claim</u>. Briefly state the facts of your case. Describe how each defendant is involved, and exactly what each defendant did, or failed to do. Include names of any other persons involved, dates, and places. You may use additional paper if necessary.

Here comes Robert E. Lee Tamallooing that my treating psychiatrist Sai Li: MD staft Psychiatrist next South 1. Said to me "Idon't like your Kind, and he

MIED (NEX. 316) CONSTITUTION
Forced me to take mediatrion that CAUSED IMPOTANCE
the complaint has been ASSIGNED FOR
CUMIT DOCTOR AT PRINTER FOR FORENSIC
INVESTIGATION. This happen at Center FOR FORENSIC PSynhiatry 8303 Platford Saline. MI 48176 "Medical Recor PSynhiatry 8303 Platford Saline. MI 48176 "Medical Recor
STATE 7/19/12 Li CEP/no. 87820 PAGE 3 Ref#11 Psychiations 2011 Dischare
Discharge Symmary Continued WITT Medication 1.) Zyprexa Zydis 5mg once in the Morning 2) Zyprexa Zydis 5mg once in the Morning 2) Zyprexa Zydre 20ma once int Bedtime IX treatment Medication
1.) Zyprexx Zydis 5mg once in the north Modulation
Zydre 20 ma once at Bedtime IX I mat ment the Ouctable
Recommendations MrLee WAS discharged to the Custody
OF the Warne County Sheriff Department (StateMENT of
Doctor)
III. Relief. Briefly state exactly what you want the court to do 10.7 CL, CZ EXHIBITS A1, A2, A3, B1, B2, C1, C2
ZIMPI - MITTING

JAM Stolding continue Darnages that

As sponded from these harm against mile

Mu Lee was continued on Madication that wath

Same & Zyproxa Zydra, and it was Resperdently

HT Bedtime from 10100 Agetter AVE. OPERATION Cot Down

Dotroit MI, 48213, and

V. <u>Demand for Jury Trial</u>. Check this box if you want your case to be decided by a jury, instead of a judge.

Plaintiff demands a jury trial on all issues.

Dated: 04/28/2014

Plaintiff's Signature

Robert L. J

Plaintiff's Printed Name

430 E. WAVVEN A

Datoit 11, 48201

City, State, Zip Code

313) 185-8855(313) /0445 Telephone Number

Telephone Number

rheadt @ Aol, CON

E-mail Address

Lacross Lover@ /Ahoo. Ce

Claim

SHOWING THAT CAN THESE PLEADS BE ENTILE To reliet:

I'm asking this Honorable court of the Dirited States to Require This matter? The claims our Attentional In the Face OF Possible contradiction, I was CHEATED OUT OF AN ASSOCIATION. Becoming Neutered AND WITH A SEXLESS relationship and Doctor-Sai Li, should take responsibility For the ATTACK, This is claimed as Twe.

RelieF

Mr Lee, Myself is demanding a relief soughted with the help of this Honorable Court. Because the Vacine/Zydrexa Zydis was able to overcome bodily defenselve mechanisms has radid servere and destructive course. Full of malice and after trial or test the New drug Proved Effective which is the burden of Droof of the Assertion or CHARGE.

And I believe this Court has Jurisdiction or Provide a reason or Justification For MV Fears OF Being-Neutered, AND WITH A SEXLESS relation SHIP.

THE harm SHOULD BE rEWARDED FROM Physical or Mental damages AND INJURY, Monotary reliet.

Relief cont

This court has grounds FOR JUPISCUCTION HIS STATEMENT SAI, LI, MD "TOON"T like your KIND" FULL OF Malice. I WANT TO STAY AND THE REA PARTY IN INTEREST THE DENFENDAI SUED IN HIS FULL CAPACITY: AND IN HIS OFFICAL CAPACITY. BECAUSE THIS Claim OF DAMAGES IS MORE THAN \$75,000. DIVESTY, \$600,000,000

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e _{pe}	2.14-CV-11722-MFL-RSVV DOC#1 Filed 04/30/14 Pg 7 0/18 Pg ID 7
IED (Rev.	5/13) General Civil Complaint
V.	Additional Information Briefly enter any additional information, you may use additional paper.
V.	Demand for Jury Trial. Check this box if you want your case to be decided by a jury, instead of a judge.
	Plaintiff demands a jury trial on all issues.
Da	nted: 04/28/2014 Plaintiff's Signature Robert F. Lee
	Plaintiff's Printed Name 430 E, WARREN AVEANTA
	Street Address Detroit, MI, 48,201
	City, State, Zip Code 313) 704-48 68 (313) 28500 Telephone Number
	Heedt Adl Com

Ref #11 FORENSIC PSYCHIATRY CFP NO. 87820

Date

PSYCHIATRIC ADMISSION SUMMARY(continued)

S. Li 11/7/11

> backwards. He is able to do simple calculations. He is able to abstract objects into categories but not abstract concepts like poem and statue. He interprets correctly the greener grass proverb well, but not for "every cloud has a silver lining."

VIII. Admission Physical Summary

The physical exam will be completed by the Medical Doctor on the Unit. The admission labs have been ordered and results are still pending. Mr. Lee agreed to the HIV test and the flu shot.

IX. Admitting Psychiatric Diagnosis

Axis I:

LEE, Robert E

Paranoid Schizophrenia; R/O Schizoaffective Disorder; Bipolar Type;

Polysubstance Abuse in Remission by history

Axis II:

Deferred **Tendonitis**

Axis III: Axis IV:

Moderate-Severe

Axis V:

GAF: 36

Summary and Impressions

Mr. Lee is a 60-year-old African-American man who presents for his fourth admission to CFP after being adjudicated IST on one count of Assault with Intent to Do Great Bodily Harm less than Murder and one count of Felonious Assault. On exam, Mr. Lee was mildly pressured, distractible, perseverative, paranoid, and grandiose. His mental status at the time makes it difficult to assess his court-related knowledge, which continues to be the major impediment towards his competency.

Mr. Lee has a long-standing history of a primary psychotic disorder. Per collateral information, he has only been on conventional anti-psychotics and a major challenge is his reluctance to take medications. He refused to take Zyprexa after I told him of the indications and side effects for it, focusing on me giving his diabetes. He will likely need a depot route to ensure compliance, and a sublingual formulation to start with. The other concern is to rule out a schizoaffective bipolar disorder which may require an additional mood stabilizer. For the time being, I agreed to Mr. Lee's request not to start medications

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Center for Forensic Psychiatry P.O. Box 2060, Ann Arbor, MI 48106

Telephone: 734/429-2531 FAX: 734/429-1817

Problem Goals, Objectives

Addressograph

Name Lee, Robert E.

CFP# 87820 November

AD 11-7-11 Wayne 06-08-1951 M/B DOB

South 1 IST

Date: November 10, 2011

Problem Number: 2 – Incompetent to Stand Trial

and Interventions

Problem Description: Mr. Lee continues to have difficulties with understanding the proceedings against him as well as difficulties in conceptualizing his case and how to defend himself in court. He continues to have psychotic symptoms which is a major impediment towards his incompetent to stand trial status.

Long-term goal: Mr. Lee will express an understanding of the nature and object of the proceedings against him and demonstrate the ability to work with his attorney in a reasonable manner.

Target Date: November 2012

Short-term goals/objectives:

1. Mr. Lee will discuss a logical account of his behavior leading to the charges during individual/group therapy over the next 90 days.

Target Date: Feb. 2012

Status: Active

2. Mr. Lee will describe the evidence against him based on the police report through individual/group therapy over the next 90 days.

Target Date: Feb. 2012

Status: Active

Treatment Interventions

Psychiatry:

- Psychiatrist will meet with Mr. Lee for 30 minutes once per week to evaluate any changes in his mental condition which may indicate the need for special precaution,
- To evaluate, monitor and prescribe medications to address mental conditions which interferes with competency.

- Sai Li, MD

Social Work: Chief Clinician will meet with Mr. Lee for up to 30 minutes per week (to include problem #1):

- To provide education regarding the issues related to his charges and courtroom procedures:
- To evaluate Mr. Lee with regard to his understanding of courtroom procedures;
- To evaluate Mr. Lee with regard to his understanding of the nature and object of the proceedings against him.

- Brian Ackerson, LMSW, DCSW



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IPOS: Team Assessment and Participation

Date: November 10, 2011

LEE, Robert E. CFP # 87820

Axis III:

Tendonitis:

Axis IV:

Severe (legal charges)

Axis V:

GAF = 36

<u>Summarize progress by problem number since last review:</u> The IPOS has been formulated using measurable goals and specific interventions. Mr. Lee's new plan will be reviewed for progress in 30 days.

<u>Progress towards discharge:</u> Mr. Lee is here on an IST order. He was a recent admit and has not been recommended competent at this time.

Services Needed Upon Discharge: Mr. Robert E. Lee will need to continue psychiatric services including taking psychotropic medications, case management, individual-group therapy, consumer run program (drop in center) and support group. Recommended attendance at AA/NA group as he used in the past (he reports 32/33 year abstinence). Placement assistance may be needed when returns to the community.

Ref #11

CENTER FOR FORENSIC PSYCHIATRY

			_
	LEE, Robe	rt E	Ξ,
Marne			

(A3)

CFP NO.

87820

Date

7/19/12 Li PSYCHIATRIC DISCHARGE SUMMARY(continued)

VIII. Medications on Discharge

- 1.) Zyprexa Zydis 5mg once in the morning
- 2.) Zyprexa Zydis 20mg once at bedtime

IX. Treatment & Medication Recommendations

Mr. Lee was discharged to the custody of the Wayne County Sheriff Department. It was recommended that he continue to take his medications in order to maintain stability.

Sai Li, M.D.

Staff Psychiatrist

Unit South-1

Holden, Carol (DCH)

From:

Holden, Carol (DCH)

Sent:

Monday, January 27, 2014 11:08 AM

To:

Currington, Karen (DCH); White, Paul (DCH)

Cc:

Holden, Carol (DCH)

Subject:

complaint from former patient

Good morning,

I received a telephone call this morning from Robert Lee, CFP # 87820, who was most recently here from 11/7/2011 – 7/19/2012. Mr. Lee indicated that Dr. Sai Li had "forced" him to take Zyprexa, by telling him that he would "impose" medication if Mr. Lee refused to take it voluntarily; consequently, Mr. Lee said, he took Zyprexa even though he did not want to. Mr. Lee said that Dr. Li did inform him of some of Zyprexa's side effects, including diabetes, and that he (Mr. Lee) was aware of others, including impotence, which is why he did not want to take Zyprexa. Indeed, according to Mr. Lee, Zyprexa made him into a "eunuch." It was Mr. Lee's impression that Dr. Li made his decision to use Zyprexa based on "animosity" he (Dr. Li) had toward him (Mr. Lee): according to Mr. Lee, Dr. Li told him that "he didn't like my kind and what I did" (stabbing an Arab-American).

Mr. Lee indicated that he now has ongoing erectile dysfunction, which has responded only to Cialis, which he cannot afford. He attributes his ED to Zyprexa (which he is no longer on), and he wanted to complain about Dr. Li's choice of this medication, which, again, he thought was motivated by animosity.

I told him that I would forward his complaint to ORR and that he could expect to hear from someone. His telephone number is 313-704-4868.

C.



DEPARTMENT OF COMMUNITY HEALTH

JAMES K. HAVEMAN

RICK SNYDER

COMPLAINT ACKNOWLEDGMENT

LANSING

February 20, 2014

Service Request # 1-52331121 Allegation # 1-52331195

Dear: ROBERT LEE Unit: Discharged

Your complaint received on 2/17/2014 alleging that your treating psychiatrist said to you, "I don't like your kind", has been reviewed by this office. In addition, The Rights Office will look into your allegation that you were forced to take medication that caused impotence.

The following action has been taken:

Your complaint has been assigned for investigation. A Rights Advisor will be contacting you soon. Under most circumstances, the investigation will be completed within 90 days and a report of findings sent to the Hospital/Director. Once the report is completed, you have the right to request mediation to resolve the dispute. The Hospital Director will send you a Summary Report and information on the Recipient Rights Appeal Process within 10 days of receiving the report.

Sincerely,

Paul D. White, Rights Advisor

CENTER FOR FORENSIC PSYCHIATRY

8303 PLATT RD

SALINE, MI, 48176

NOTE: In addition to this office, there are advocacy organizations available to provide you consultation and assistance in the complaint process. If you would like further information in this regard, please contact me at 1(888)509-6006.

Attachment: Copy of complaint cc: Hospital/Center Director

Filed 04/30/14 Pg 14 of 18 Pg ID 14 2:14-cv-11722-MFL-RSW,



10 Peterboro Detroit, Michigan 48201-2722

Ph: (313) 831-3160

Administration Fax: (313) 831-2604 Medical Records Fax: (313) 831-8783

www.dcccmh.org

Irva Faber-Bermudez, APRN, BC President & Chief Executive Officer

November 19, 2013

ROBERT LEE **OASIS** Transitional 13220 Woodward Ave. Highland Park, MI 48203

Dear ROBERT LEE:

To Whom It May Concern;

Mr. Robert was followed in this clinic from 1/17/13 until 7/2/13 for a diagnosis of Schizoaffective Disorder. During this time he was treated with psychotropic medications including Zyprexa which he received from 1/17/13 until he reported difficulties with erectile dysfunction on 2/14/13. The Zyprexa was stopped on 2/14/13 due to known possible side effect of erectile dysfuntion from Zyprexa as reported by the FDA.

anguin Sett Chief

Sincerely

Jacqueline M. Stoll, NP Psychiatrist / PA / NP

313-831-3160



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1 Filed 04/30/12

2727 Second Ave Suite 300

Detroit, Mi 48201

Phone: 3135786121 Fax: 3139630103

Jacqueline Stoll NPI# 1770735136

Date 03/14/2013

DOB 06/08/1951

Age 61

Name ROBERT LEE Phone (313) 921-9422

Address 10100 HARPER AVE, OPEATION GET DOWN, DETROIT, MI, 48213

Script#	Medication			100 (100 (100 (100 (100 (100 (100 (100	Quantity	Refill
291111	Risperdal 2mg Tablet				**30**	zero
	Daily at bedtime for 30 da	/S	100 - 100 -		(thirty)	A CONTRACTOR OF THE PROPERTY AND A

There is one prescription on this page.

Signature

Jacqueline Stoll

nte Jap

Plaintiff

☐ 110 Insurance

☐ 130 Miller Act

☐ 196 Franchise

☐ 120 Marine

☐ 220 Foreclosure ☐ 230 Rent Lease & Ejectment □ 240 Torts to Land 245 Tort Product Liability 290 All Other Real Property ORIGIN (Place an "X" in One Box Only) Original Proceeding VI. CAUSE OF ACTION VII. REOUESTED IN **COMPLAINT:** OVIII. RELATED CASE(S) (See instructions): DOCKET NUMBER IF ANY **JUDGE** FOR OFFICE USE ONLY MAG. JUDGE JUDGE APPLYING IFP AMOUNT RECEIPT#

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JANT TO LOCAL RULE 83.11

JANE TO ECOAL ROLL CO.T.	
1. Is this a case that has been previously dismissed?	Yes
If yes, give the following information:	
Court:	
Case No.:	
Judge:	
Other than stated above, are there any pending or previously discontinued or dismissed companion cases in this or any other court, including state court? (Companion cases are matters in which it appears substantially similar evidence will be offered or the same or related parties are present and the cases arise out of the same transaction or occurrence.)	Yes No
If yes, give the following information:	
Court:	
Case No.:	
Judge:	
Notes :	
NOIGS.	

		·····	New Laws	.14 /	hook lifet
	Instructions: Port a die	ek mar	A Company of the Comp		THECK LIST e entry to be sure you have all the required documents.
7	- 40				
	lawsuit in the blank total in the blank.		efendants named in your r, add 2 and then enter the Complaints.		Case:2:14-cv-11722 Judge: Leitman, Matthew F. MJ: Whalen, R. Steven Filed: 04-30-2014 At 12:53 PM CMP LEE V. SAI LI M.D. (DA)
	Received by Clerk:	Addre	sses are complete:	<u> </u>	
			re government agencies: s of the complaint for the U	I.S. Att	torney and the Attorney General.
	25 75 300 St. 17 20 St.				
	. Il Paying	jine t	ling fee. A second		IPANGENE THE Filing see Be Wallvells
	Current new civil act	ion fili	ng fee is attached.	0	Two (2) completed Application to Proceed in District Court without Prepaying Fees or Costs forms.
	Fees may be paid by chec	k or mo	ney order made out to:		
	Cleri	k, U.S. D	istrict Court		,
	Received by Clerk:	_ Recei	ot #:		Received by Clerk:
.	Se ervice via Summons	1:3	e Methodio Service youw e vice by H.S. Marshal my calulouse systed	(leng	Soy (candily som selected arts: Sering a Wares of Summers Attraction and continues are selected.
	hy Calls				
<u>lbo</u>	byself				Way and and submit any forms regarding the Waiser
	Two (2) completed		Two (2) completed	回	You need not submit any forms regarding the Waiver
	Two (2) completed summonses for		USM - 285 Forms per	回	You need not submit any forms regarding the Waiver of Summons to the Clerk.
(2)	Two (2) completed summonses for each defendant		USM – 285 Forms per defendant, if you are	Ò	of Summons to the Clerk.
	Two (2) completed summonses for		USM - 285 Forms per	囟	1
	Two (2) completed summonses for each defendant including each		USM – 285 Forms per defendant, if you are requesting the U.S.	D	of Summons to the Clerk. Once your case has been filed, or the Application to Proceed without Prepaying Fees and Costs has been granted, you will need:
Ø.	Two (2) completed summonses for each defendant including each defendant's name		USM – 285 Forms per defendant, if you are requesting the U.S. Marshal conduct service of your complaint.	日	of Summons to the Clerk. Once your case has been filed, or the Application to Proceed without Prepaying Fees and Costs has been granted, you will need: One (1) Notice of a Lawsuit and Request to
	Two (2) completed summonses for each defendant including each defendant's name		USM – 285 Forms per defendant, if you are requesting the U.S. Marshal conduct service of your complaint. Two (2) completed	P	of Summons to the Clerk. Once your case has been filed, or the Application to Proceed without Prepaying Fees and Costs has been granted, you will need: One (1) Notice of a Lawsuit and Request to Waive Service of a Summons form per
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	Two (2) completed summonses for each defendant including each defendant's name and address.		USM – 285 Forms per defendant, if you are requesting the U.S. Marshal conduct service of your complaint. Two (2) completed Request for Service by U.S. Marshal form.		of Summons to the Clerk. Once your case has been filed, or the Application to Proceed without Prepaying Fees and Costs has been granted, you will need: One (1) Notice of a Lawsuit and Request to Waive Service of a Summons form per defendant. Two (2) Waiver of the Service of Summons forms per defendant. Send these forms along with your filed complaint and a self-addressed stamped envelope to each of your defendants.
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